

LAW OFFICE OF ADAM T. NEWMAN, P.C.

2005 MERRICK ROAD, SUITE 305
MERRICK, NEW YORK 11566

TELEPHONE 917.658.4200
FACSIMILE 212.545.9034

ADAM T. NEWMAN
Email: adam@adamnewmanlaw.com

February 25, 2015

Via ECF

Honorable Sandra J. Feuerstein, U.S.D.J.
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: Manti's Transportation and Alfred J. Manti
Case No.: 13 Civ. 6546 (SJF)

Dear Judge Feuerstein:

I represent the defendants Patricia Kenner and CT Lines d/b/a Campus Coach in connection with the referenced matter. As the Court is well aware, Plaintiff herein has gone to already extraordinary efforts to perpetuate this matter beyond all reason.

Nonetheless, I received a very disturbing call this morning from Mr. Manti advising that he was preparing to file and commence a new action against my clients, against former agents of theirs, and against me personally as counsel for same.

Given the continued irrational threats of legal action, despite this Court's Order of September 10, 2014 enjoining same, it is respectfully requested that this Court, upon its discretionary powers, modify the Order of the Court dated September 10, 2014, to further enjoin plaintiff herein to commence any related action to the 4 actions he has already commenced related to these transactions.

Pursuant to the previous Order of the Court, the Court noted at page 40:

The Instant Action is Manti's fourth unsuccessful attempt to litigate essentially the same claims stemming from the November 1999 Transaction. Manti filed the Instant Action notwithstanding this Court's clear warning in the Manti II Order that a filing injunction would be imposed upon him if he continued filing actions based on the November 1999 Transaction. Upon consideration of Manti's

Hon. Judge Sandra J. Feuerstein

February 25, 2014

Page 2

conduct in light of the factors listed above, the Court concludes that the imposition of an injunction against Manti from commencing actions in this Court, on behalf of himself or MTI, is warranted.

However, before imposing a filing injunction, the Court must first provide a litigant with notice and an opportunity to be heard. *See Lau*, 229 F.3d at 123 (quoting *Moates v. Barkley*, 147 F.3d 207, 208 (2d Cir. 1998)). Accordingly, **Manti is directed to show cause, by filing an affidavit on or before September 19, 2014**, why an order should not issue enjoining him from filing any new civil action or proceeding in this Court without first obtaining leave of the Court by requiring him: (1) to file a motion for leave to commence any new action or proceeding in this Court, setting forth the good faith basis for the filing of the new action or proceeding, within twenty (20) days of the filing of any complaint, petition or pleading, or the action will be *sua sponte* dismissed with prejudice and without further notice to plaintiff; and (2) to append a copy of the injunction order to any complaint, petition or pleading sought to be filed in this Court and served upon all parties to the action or proceeding with the summons and complaint. However, nothing in any injunction order shall be construed to limit Manti's access to any United States Court of Appeals on any matter.

Manti's failure to file an affidavit in accordance with this order to show cause, or to otherwise respond to this order to show cause, shall result in the entry of the aforementioned injunction order without further notice.

Plaintiff Manti has not filed any papers specific on the issue of further suits, accepting such prohibition and injunction as noted above.

Nonetheless, clearly the sanction of the Court has been insufficient to deter Plaintiff from flouting the authority of this Court and denying this Court's ability to prohibit further related action.

We therefore request that this Court extend the prior Order to encompass all further legal actions by Plaintiff related in any way to the prior claims **and that a hearing be scheduled to assess damages for criminal contempt of this Court's Order and injunction unless Plaintiff shall accede to the authority of this Court and execute a stipulation and release of any known or unknown claims against any of the parties herein and any of their current or former agents or counsel.**

We recognize the severity of the contemplated request, and submit to the Court that no other deterrent will serve. Plaintiff has previously advised that he has no intention of paying any costs or fees adjudged by this Court upon approval of the previously submitted bill of costs. Plaintiff has previously advised that he intends to commence further actions, he specifically advised to the undersigned that he believes he "is only halfway through." And now, Plaintiff advises that he intends to extend these frivolous claims to include agents and counsel of the named defendants, undoubtedly with the hope that he can separate client and counsel.

In an email dated September 11, 2014, Plaintiff advised (as annexed hereto) in pertinent part:

Hon. Judge Sandra J. Feuerstein

February 25, 2014

Page 3

As far as this case before Judge Feuerstein, we are still on our plan. We will be filing an appeal and maybe head to State Court, it is not a win per se but you truly won't believe the national story that might be running on this case. I know you questioned the existence of Ellis Henican, who actually said my losing this decision is a better story for him, is very real. There are a few others but Ellis knows where this can go and he wants it. The best part is that no one can do anything about it, not even the Judge. That's cool !!!

Why do you think there are 2 schedule "A" [sic]. I know the whole story, and it is going to come out. Judge Feuerstein may not be interested in this but many people are, and they're interested in why Feuerstein isn't interested.

We include the foregoing in light of the provisions of Federal Rule of Criminal Procedure 42 (a) (3) and whether the Court considers that the related contemptuous conduct constitutes disrespect toward or criticism of a judge.

Regarding the balance of the attached email, we note that Plaintiff is considering leaving the jurisdiction for at least some portion of the year and whether appropriate surety for his appearance is otherwise required.

Accordingly, it is requested pursuant to the inherent authority of this Court, that this Court issue an Order to Show Cause pursuant to Federal Rule of Criminal Procedure 42 stating the time and place of trial to assess charges of criminal contempt, and further request that the Court request that the contempt be prosecuted by an attorney for the government – or to the extent that the Court believes that the conduct may be sufficiently addressed by levy of a fine as opposed to incarceration – that in the interests of justice that the Court appoint the undersigned to prosecute the allegation of criminal contempt.

In the alternative, it is respectfully requested that this Court schedule a conference to question Plaintiff directly on the aforementioned issues concerning his future intent and disregard for this Court's Order and authority, and consider whether a criminal contempt order should be summarily levied and imposed.

Thank you for your consideration.

Very truly yours,

By:


ADAM T. NEWMAN

cc: Alfred J. Manti, *pro se* - via ECF; via e-mail

Sarah O'Connell, Esq. – via ECF; via e-mail

Fulbright & Jaworski, LLP

Attorneys for defendants General Electric and Citicapital

Hon. Judge Sandra J. Feuerstein

February 25, 2014

Page 4

666 Fifth Avenue
New York, New York 10103

al manti

9/11/2014, 10:27 PM

Re: Manti Order of Dismissal.pdf

To adam@adamnewmanlaw.com

Mr. Newman,

The only reason I started this up again was the title from Montana. The different date on the title sent to me, told the whole story. Larry Shute and Bert had a deal with the buses before the actual selling date of 11/18/99. That is why the second bus was never painted. It was that simple, the finance companies already have this cash cow of skimming the repossession value to the auctioneer that is done by the finance guys, Shute and Umberger. Adam, I talked to the people who did it with Shute. I have been everywhere. You don't seem to understand, I was in the bus company for a long time. I know my way around and already knew these people. I know the whole story, you think GE doesn't know, come on we're not children.

That is why the Indiana and West Virginia titles made the titles of the other buses clear of the Oklahoma liens. Come on, a 16 year old can figure this out. What GE did to that poor girl was a disgrace, you think I'm kidding, my wife made my life miserable to help her. I can't imagine doing that to anyone, but they wanted to cover this up. If you think I have tapes of Bert , I have 10 times more on GE and even Dla Piper. Look at Sergei, Bert's friend, got a \$54,000.00 bus, my bus, 2 months after I bought it, for I think under \$300.00 I have tapes of Sergei on several occasions how that was was acquired. I actually like Sergei, will see. Come to think about it, I liked Bert and Patti also.

I remember in my first deposition before you and I knew you would ask about the Transit Case and I acted surprised that you knew that, you said assume I know everything. Right there I knew you didn't, very few people know and its not on the internet.

As far as what you know or don't know, I have an extensive tape collection of many people involved in this case, Montana, California, Indiana, Iowa, New York and a couple of more. I have a personal friend who does undercover and he has a few girls who would tempt St. Peter. You would not believe what some of these guys say and to people that they just met. Kind of embarrassing.

I have very good tapes of Bert when he asked for me to call him to settle this. I believe it was last year and he begged me for the US attorney phone number. I told him to hire you. He went into depth about how you told him you could put pressure on Hollender and follow Citicapital and GE with the phony sanctions motion. I truly dislike Bert for what he did after years of our working together, my only hope is that he sees my newest grandchild who isn't one yet get married. I want him to live a very, very long time. Patti would just love that.

Mr. Newman, as I have stated before, I have a plan. It wasn't animosity, we wanted to show exactly what happened, plan and simple. Campus Coach and Larry Shute made up this deal to keep the money and the buses. We want to make public exactly what happened, show Patti and Shute exactly what they are, thieves. You think I'm making this up, I'm serious. You have to understand, Henican needs a face, all the other buses are once removed from the actual sale, Patti is front and center, she wanted all the money, and got it. She's the face, the greed, you have it all, what a story. Adam, that's my plan and no one can stop it, no one. I approached Ellis with this right after we received the title in 2011, he was in immediately, even talked to the girl in Montana. Adam. I do not bullshit. Never have. Patti knew or thought she knew my financial situation and kept the money and buses knowing I had borrowed the money. Only the lowest form of life could do that. She said fuck Al Manti, well guess what ?

I have an incredible number of very close friends, I'm extremely lucky. My whole life I have never lied for personal gain, I just could not imagine ever doing that. I plan on getting even.

As far as this case before Judge Feuerstein, we are still on our plan. We will be filing an appeal and maybe head to State Court, it is not to win per se but you truly won't believe the national story that might be running on this case. I know you questioned the existence of Ellis Henican , who actually said my losing this decision is a better story for him, is very real. There are a few others but Ellis knows where this can go and he wants it. The best part is that no one can do anything about it, not even the Judge. That's cool !!!

It's not just this case but the whole country with this repossession scam and the title skipping which is a very real problem that all the state DMV's are complaining about but no one is listening. Guess whose name is front and center for the title skipping, Patricia Kenner. They call what Patti did as, Classic title skipping, she has a personal deal with the finance guy and they split all the money not the repossession skim amount. And guess who they stick with the bill ?

Why do you think there are 2 schedule "A". I know the whole story, and it is going to come out. Judge Feuerstein may not be interested in this but many people are, and they're interested in why Feuerstein isn't interested.

My personal attorney has some serious connections and I have already talked to a independent pre-producer, whatever that means, about doing this story. We also talked to a 60 minutes producer and I said to him if what I show you in 2 minutes doesn't get your jaw to drop, leave. I put the documents on the table and he said he was in, in under a minute.

I'll finish up here, although I have enjoyed talking to you these last few months.

Mr. Newman, I have always lived my life a certain way. I can afford to live anywhere but I like where I live in Staten Island. My friends are fireman, cops and such. Many years ago in the early 80's I could have easily moved much higher but I didn't like the air up there or the people. I get my hands dirty everyday. It wasn't that the people weren't nice it just wasn't for me. I like a little color in my life.

Mr. Newman, I didn't ask to be put into this situation and I actually forgot about it till that missing title showed up on my door. I have never in my life acted vindictively but Campus is testing me and I believe shortly Patti will regret ever knowing Al Manti. Just the thought of producing these tapes makes me want to take a shower but I think Bert knows about these tapes and so be it.

Mr. Newman, I was actually going to have you listen to Bert. No one deserves to be hurt more than those two. They hurt many people closing the doors on Campus Coach without warning, truly amazing. A lot of people hate them and for good reason. You know where those fliers are coming from, or you have a good idea.

Adam, you a very bright and competent lawyer, please do not tell me you don't know everything that happened here. You were protecting and representing your client, I understand that, but..... I hold no animosity towards anyone, even after what they have done. We are all grown-ups, these people have put themselves into this situation, we'll see what happens.

This is Thursday, John called me on Tuesday, to call Bert, he wanted to settle, I refused to call him. Today, at 2:15 pm there was a number on my screen of a missed call. It wasn't the standard Campus Coach number and I called back. A woman answered by saying hello, I said someone at this number just called me, she asked who I was , I responded, Al Manti, and she said, OH!, hold on and I was connected to Bert. I asked him why he was calling and he said it wasn't him. I hung up. I told you about the first call before. Please have him stop.

Adam, I do not need anyone's money, Bert knew my situation way back in the early 90's. Bert and GE asked me what it would take to make this go away, I told them both. I think this is far from over. Either way, I just collected my first Social Security check yesterday, I already hate not working.

My cousin who I did business with 40 years ago wants me to come to Hawaii at least 3 months a year. He lives in Oahu but travels 6 months a year, huge house and cottage. I'm considering it. I have lived here all my life, never wanted to leave. Maybe

Lets finish up, this is not a threat, I mean it, if this proceeds to the point of no return, so be it. It couldn't happen to a nicer group of people. I have stood by for a long time and people have had their way, turn around is fair play.

That is my plan.

Thank you

al manti